

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS,  
INC.,

Defendants.

Civil Action  
No. 04-CV-10294-DPW

(additional captions to follow)

**[PROPOSED] ORDER CONSOLIDATING ALL RELATED  
ACTIONS; APPOINTING JEFFREY FOSS LEAD PLAINTIFF AND  
FOR APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**

MICHELLE TREBITSCH, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10307-DPW

INFORMATION DYNAMICS, LLC, Individually  
And On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10308-DPW

PETER KALTMAN, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10309-DPW

SAMANTHA DEN, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10310-DPW

STEVE L. BAKER, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10333-DPW

MICHAEL KAFFEE, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10345-DPW

RONALD KASSOVER, Individually And On Behalf  
Of The Ronald Kassover IRA And All Others  
Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10329-DPW

RICHARD CURTIS, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10314-DPW

HAIMING HU, Individually And On Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-cv-10346-DPW

DANIEL WILLIAMS, Individually and on behalf of  
all others similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No.04-cv-10359-DPW

CHARLES STARBUCK, Individually and on behalf  
of all others similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action  
No. 04-CV-10362-DPW

SANUEL HO, Individually and on behalf of all others  
similarly situated,

Plaintiff,

-vs.-

PAUL R. JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M. AHMED,  
STEPHEN J. NILL, and SONUS NETWORKS, INC.,

Defendants.

Civil Action.  
No. 04-cv-10363-DPW

Upon good cause shown, IT IS HEREBY ORDERED THAT:

**Consolidation**

The above captioned actions and any subsequently filed related actions are consolidated for all purposes including, but not limited to, discovery, pretrial proceedings and trial proceedings, pursuant to Rule 42(c) of the Federal Rules of Civil Procedure. This matter shall be identified as: In Sonus Networks, Inc. Securities Litigation, Case No: 04-CV-10294-DPW, and the files of the action shall be maintained in one file under Master File No. 04-CV-10294-DPW.

**Appointment Of Lead Plaintiff**

Jeffrey Foss is hereby appointed lead plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. 78n-4(a)(3)(B) in the consolidated Action. The appointment of lead plaintiff is without prejudice to defendants' right to challenge the adequacy, typicality or ability of lead plaintiff to properly represent the absent class members in this consolidated action or the propriety of this case being certified as a class action.

**Plaintiff's Counsel**

Lead plaintiff's selection of the law firm of Abbey Gardy, LLP as Plaintiff's Lead Counsel in the consolidated action is approved.

Plaintiff's lead counsel are hereby vested by the Court with the following responsibilities and duties in connection with the consolidated actions:

- To direct and coordinate the briefing and arguing of motions;

- To direct and coordinate the initiation and conduct of discovery proceedings, including, but not limited to, requests for production of documents, written interrogatories, requests for admissions, depositions and/or third party subpoenas;
- To direct and coordinate the examination of witnesses in depositions and on oral interrogatories;
- To act as spokespersons at pretrial conferences;
- To call meetings of plaintiffs' counsel as appropriate or necessary from time to time;
- To direct the preparation for a trial of this matter and to delegate work responsibilities to selected counsel as may be required in such a manner as to lead to the orderly and efficient prosecution of this litigation and to avoid duplicative or unproductive effort;
- To direct and coordinate the conduct of pre-trial, trial and post-trial proceedings;
- To consult with and employ experts;
- To initiate and conduct all settlement negotiations with counsel for defendants; and
- To perform such other duties as may be expressly authorized by further order of the Court.

No motion, request for discovery, or other pre-trial proceedings shall be initiated or filed by any plaintiff except through Plaintiff's Lead Counsel.

Defendants' counsel may rely upon all agreements made with Plaintiff's Lead Counsel, and such agreements shall be binding on all plaintiffs in the consolidated actions.

Plaintiff's Lead Counsel are hereby designated as the counsel for plaintiffs upon whom all notices, orders, pleadings, motions discovery, and memoranda may be served and defendants shall effect service of papers on plaintiffs by serving Plaintiff's Lead Counsel. Plaintiff's Lead Counsel is authorized to receive orders, notices, correspondence and telephone calls from the Court and the Clerk of the Court on behalf of all plaintiffs.

If defendants file a single pleading or other paper directed to all plaintiffs in these consolidated actions, the response on behalf of plaintiffs shall be made in a single pleading or other paper to be served by Plaintiff's Lead Counsel. All plaintiffs in these consolidated actions shall be bound by that pleading or paper.

The organizational structure established by this Order shall bind counsel for plaintiffs in all securities fraud class actions consolidated by this Order.

SO ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 2004

\_\_\_\_\_  
United States District Judge